



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 2, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
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Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, January 18, and January 19, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is an encrypted thumb containing electronically stored information (“ESI”) obtained by the government, which has been designated “Sensitive Discovery Material” under the February 22 Order. The drive contains materials extracted from electronic devices and storage media recovered during the searches of premises located at 210 Pavonia Avenue (the “Pavonia premises”) and 351 Summit Avenue (the “Summit premises”) in Jersey City, New Jersey, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 37546 – ESI 37554). The documents produced in ESI 37546 were obtained from one of two devices, one of which was located at the Pavonia premises and the other of which was located at the Summit premises. The documents produced in ESI 37547 were obtained from the search of a Dell Inspiron laptop

recovered from the living room of the Pavonia premises. The documents produced in ESI 37548 – ESI 37554 were obtained from devices and external media obtained from the Pavonia premises and from a vehicle outside of the Pavonia premises during the search.

Pursuant to your request, these materials are being provided in native format.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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Enclosures (ESI00037546-ESI00037554)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)